



Response to Ofcom's consultation on : "Digital Dividend: Clearing the 800 MHz band" – April 2009

OVERVIEW

The GSMA welcomes the opportunity to respond to this consultation. The GSMA believes that access to harmonised UHF spectrum is very important to ensure broadband availability in rural areas. We agree with Ofcom's analysis that the benefits of having a band available for mobile, that is compatible with the rest of Europe, far outweigh any costs of migrating services out of the 790 – 862 MHz band.

By signalling its intention to align with the WRC frequency band (790 to 862 MHz) the UK is joining a growing number of major markets that will use this band for mobile broadband in Europe. The UK decision will increase momentum and encourage other countries to follow suit in a "domino effect".

The net outcome will be cheaper and better handsets for European consumers, due to economies of scale in handset production. This will allow mobile broadband to better serve consumer needs in rural areas and developing markets.

Harmonised Digital Dividend spectrum will also allow mobile broadband to reach its full potential as a viable alternative to fixed broadband for many consumers. This increase in competition for broadband services will benefit all broadband users. The growth of mobile broadband will also help to foster long-term economic growth. This is particularly important in the current economic climate.

About the GSMA

Founded in 1987, the GSMA is the global trade association of the mobile industry, representing more than 750 GSM and 3G mobile phone operators across 218 countries and territories of the world. In addition, more than 180 manufacturers and suppliers support the Association's initiatives as associate members.

The primary goals of the GSMA are to ensure that mobile phones and wireless services work globally and are easily accessible, enhancing their value to individual customers and national economies, while creating new business opportunities for operators and their suppliers. The Association's members represent more than 3.7 billion GSM and 3G connections – nearly 90% of the world's mobile phone connections.

The GSMA plays a pivotal role in the development of the GSM platform and the global wireless industry. Much of the GSMA's work is focused on two areas: Emerging Services and Developing Markets. The GSMA helps its members develop and launch new services, ranging from mobile instant messaging to video sharing to mobile Internet access, which will work across networks and across national boundaries. At the same time, the GSMA is heavily engaged in the industry's push to extend basic voice, text and broadband access services to more people and assisting Administrations in developing communications infrastructure in their countries.

GSM is an evolving wireless communications standard that already offers an extensive and feature-rich 'family' of voice and data services. The GSM family of technologies consists of today's GSM, General Packet Radio Service ([GPRS](#)), Enhanced Data rates for GSM Evolution ([EDGE](#)) and third generation GSM services ([3GSM](#)) based on W-CDMA and HSDPA access technologies. Together with LTE (Long Term Evolution), these technologies underpin the GSM platform.

The [GSMA Association's Board](#) comprises top-level representatives of some of the world's leading mobile operators, such as AT&T, Bharti Airtel, China Mobile, MTN Group, Orange, Orascom and Vodafone.

Discussion

The GSMA has long believed that there are substantial benefits to be had from harmonised spectrum assignments for mass market mobile services. The benefits are two fold, namely cheaper mobile devices, and better designed ones with superior radio performance¹. In the case of pan-European services, there is also the substantial benefit of improved interference control between countries.

The economic and social benefit of broadband are clear². Numerous economic studies have demonstrated this, and it is clear that access to broadband services for all citizens is not a luxury. Broadband is required to allow citizens to fully engage with services such as e-government and being part of the knowledge economy (as well as services such as telemedicine). Mobile broadband has a clear role in offering broadband in rural areas, and in increasing competition in urban areas.

The GSMA agrees that more and more European countries are coalescing around the bands identified at the World Radiocommunication Conference (WRC), and being planned by the CEPT. Indeed since the consultation was launched Germany has announced it will clear and award the 790 – 862 MHz band by the end of this year, to facilitate one of the largest spectrum awards in German history (with over 300 MHz on offer³). This is to help provide a stimulus to the German economy and to promote job creation.

¹ See http://www.gsmworld.com/our-work/public-policy/spectrum/digital-dividend/frequency_harmonisation.htm for more detail.

² See <http://www.analysismason.com/PageFiles/11730/GSMA.pdf>

³ With spectrum also awarded from mobile bands other than the Digital Dividend spectrum

The industry believes that these UHF bands are ideal for the deployment of the newest version of 3G, known as LTE (Long Term Evolution). In the GSMA's response to the Commission workshop on the Digital Dividend in Europe⁴ we made clear our view that LTE services could start to be deployed as early as the year 2011, with large scale deployment by the year 2012 (depending on clear regulatory signals by the end of this year).

The GSMA therefore believes that the harmonised band of 790 – 862 MHz should be made available as soon as possible to ensure that UK citizen consumers can derive the maximum benefit from mobile broadband, as well as maintaining the UK's international competitiveness.

Conclusions

We support Ofcom's analysis that clearing the 800 MHz band is in the interests of UK citizens and consumers, and agree that the band 790 to 862 MHz should be cleared and made available to mobile services as soon as possible.

For questions regarding this response please contact:

Mr Roberto Ercole
Director of Spectrum Regulation
GSM Association

rercole@gsm.org

You can see more information about the Digital Dividend on our web site at :

<http://www.gsmworld.com/our-work/public-policy/spectrum/digital-dividend/index.htm>

⁴ <http://www.analysismason.com/PageFiles/11730/GSMA.pdf> (conclusion to question 4)